

**FILED**

**APR 18 2019**

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL W. RUSSELL,

Defendant.

**4:19CR306 HEA/DDN**

**INDICTMENT**

**COUNT 1**

The Grand Jury charges:

From on or about September 1, 2018, through March 4, 2019, within the Eastern District of Missouri, the defendant,

**DANIEL RUSSELL,**

in a matter affecting interstate commerce, knowingly transferred, possessed, and used, without lawful authority, the means of identification of another, that being the Maries County Bank debit card of M.G., account number ending in -662, with the intent to commit, and in connection to the felony crimes of theft of government funds, Title 18, United States Code, Section 641, and Stealing, RSMo Section 570.030.

In violation of Title 18, United States Code, Section 1028(a)(7).

**COUNT 2**

The Grand Jury further charges that:

From on or about September 1, 2018, through March 4, 2019, in the Eastern District of Missouri, the defendant,

**DANIEL RUSSELL,**

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the Maries County Bank debit card of M.G., account number ending in - 662, during and in relation to the commission of the felony offenses of: theft of government funds, Title 18, United States Code, Section 641; and stealing, RSMo Section 570.030.

In violation of Title 18, United States Code, Section 1028A.

**COUNT 3**

The Grand Jury further charges that:

From on or about February 1, 2019, through March 4, 2019, within the Eastern District of Missouri, the defendant,

**DANIEL RUSSELL,**

did embezzle, steal, purloin, and knowingly convert to his use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: \$1,850.00 in Title II Social Security Administration disability benefits, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN,  
United States Attorney

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Special Assistant United States Attorney